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November 6, 2017

VIA ECF

Hon. P. Kevin Castel
United States District Judge
500 Pearl Street
New York, NY 10007-1312

**Re: *IN RE APPLICATIONS OF APOSTOLOS MANGOURAS*,
Case No. 17 Misc. 00172
Memorandum Endorsement dated November 3, 2017**

Dear Judge Castel:

We represent Respondents in the above-referenced case, and write concerning the Court's direction, set forth in your Honor's Memorandum Endorsement of November 3, 2017, that:

The Court has not yet ruled on the attorney-client privilege work product issue and the process ordered by the Court shall continue.

ECF No. 64.

To the extent this direction is intended to require us to produce for *in camera* review the ten documents designated by Applicant from our privilege log, we earnestly request that your Honor stay it. We are concerned that our disclosure to anyone, including the Court, of any document that is in our possession as attorneys for the Kingdom of Spain could potentially expose our firm, Mr. Starer, and any individual lawyer involved in such disclosure, as well as the representatives of the Spanish State Attorney's Office who have been working with our firm, to potential criminal liability under Spanish law. Hon. Luis Serrano will write to you by November 8, 2017 in more detail on this point, which he, and his predecessor, Hon. Fernando Irurzun Montoro, have both made in previous correspondence addressed to the Court. *See* Serrano July 26, 2017 Letter, Waters Aff. Exh. A (ECF No. 37-1) at § 10 *and* Irurzun Montoro August 2, 2013 Letter, Waters Aff. Exh. A (ECF No. 24-1 in Case No. 1:13-mc-238) at § 4.

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Resolution of the question whether this action should be stayed, including any motion practice in the Court of Appeals, is not likely to be a lengthy process. Pending that resolution, we respectfully urge the Court not to require us to take any step that could violate Spanish law.

We are grateful for the Court's attention to this matter.

Respectfully,

SQUIRE PATTON BOGGS (US) LLP



Victor Genecin

cc: Thomas L. Tisdale, Esq. (by e-mail)
Sean Sheely, Esq., Holland & Knight LLP (by e-mail)
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